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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

**MASTER SHORT FORM
COMPLAINT FOR DAMAGES FOR
INDIVIDUAL CLAIMS**

Plaintiff(s) named below, and for Complaint against the Defendants named below,
incorporate The Master Complaint in MDL No. 2641 by reference (Document 364).

Plaintiff(s) further show the court as follows:

1. Plaintiff/Deceased Party:

Lorraine Abraham

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of consortium
claim:

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):

4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time
of implant:

Virginia

5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time
of injury:

Virginia

6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

Virginia

7. District Court and Division in which venue would be proper absent direct filing:

Western District of Virginia – Abingdon Division

8. Defendants (Check Defendants against whom Complaint is made):

✓ C.R. Bard Inc.

✓ Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction:

✓ Diversity of Citizenship

☐ Other: _____

a. Other allegations of jurisdiction and venue not expressed in Master Complaint:

10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim

(Check applicable Inferior Vena Cava Filters):

✓ Recovery® Vena Cava Filter

☐ G2® Vena Cava Filter

☐ G2 Express® (G2® X) Vena Cava Filter

☐ Eclipse® Vena Cava Filter

☐ Meridian® Vena Cava Filter

☐ Denali® Vena Cava Filter

☐ Other: _____

11. Date of Implantation as to each product:

10/28/04

12. Counts in the Master Complaint brought by Plaintiff(s):

- ✓ Count I: Strict Products Liability – Manufacturing Defect
- ✓ Count II: Strict Products Liability – Information Defect (Failure to Warn)
- ✓ Count III: Strict Products Liability – Design Defect
- ✓ Count IV: Negligence – Design Defect
- ✓ Count V: Negligence – Manufacture
- ✓ Count VI: Negligence – Failure to Recall/Retrofit
- ✓ Count VII: Negligence – Failure to Warn
- ✓ Count VIII: Negligent Misrepresentation
- ✓ Count IX: Negligence *Per Se*
- ✓ Count X: Breach of Express Warranty
- ✓ Count XI: Breach of Implied Warranty
- ✓ Count XII: Fraudulent Misrepresentation
- ✓ Count XIII: Fraudulent Concealment
- ✓ Count XIV: Violations of Applicable Virginia (insert State) Law
Prohibiting Consumer Fraud and Unfair and Deceptive Trade
Practices
- ☐ Count XV: Loss of Consortium
- ☐ Count XVI: Wrongful Death
- ☐ Count XVII: Survival
- ✓ Punitive Damages

☐ Other(s): _____ (please state the facts supporting this Count in the space, immediately below)

13. Jury Trial demanded for all issues so triable?

✓ Yes

☐ No

Respectfully submitted this 23rd day of September, 2016

/s/ Jeff Seldomridge

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Attorneys for Plaintiffs

I hereby certify that on September 23, 2016, I electronically transmitted the attached document to the Clerk's office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jeff Seldomridge
Jeff Seldomridge
Virginia Bar No. 89552